FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Milestone Contractors, L.P.
88 West US 24
Kentland, Indiana 47951

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F111-11388-00018	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.4 Record Keeping Requirements

D.2.5 Reporting Requirements

Certification Form
Emergency/Deviation Form
Monthly Report Forms
Quarterly Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary batch mix asphalt plant.

Authorized individual:	Ron Terrell
Source Address:	88 West US 24, Kentland, Indiana 47951
Mailing Address:	5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, IN 46242-1459
Phone Number:	317-788-1040
SIC Code:	2951
County Location:	Newton
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) one (1) aggregate rotary dryer, identified as unit No. 3, with a maximum capacity of processing 300 tons of aggregates per hour, equipped with one (1) waste oil fired aggregate dryer burner with a maximum rated capacity of 75.6 million (MM) British thermal units (Btu) per hour using No. 2 distillate fuel oil and natural gas as back-up fuels, and one (1) cyclone and one (1) baghouse in series for air pollution control, exhausting at one (1) stack, identified as S-1;
(b) one (1) No. 2 distillate fuel oil-fired hot oil heater, identified as unit No. 19, with a maximum rated capacity of 2.115 MMBtu per hour, using natural gas as a back-up fuel, exhausting at one (1) stack, identified as S-2;
(c) one (1) hot aggregate elevator, identified as unit No. 5;
(d) one (1) hot aggregate screen system, identified as unit No. 6;
(e) four (4) hot aggregate storage bins, identified as unit No. 7, with a total maximum aggregate storage capacity of 45 tons;
(f) one (1) hot aggregate weigh hopper, identified as unit No. 8;
(g) one (1) hot liquid asphalt weigh bucket, identified as unit No. 9;
(h) one (1) pug mill (mixer), identified as unit No. 10, with a maximum hot mix batch holding capacity of 8,200 pounds;
(i) one (1) batch tower fugitive dust capture system, identified as unit No. 11, used to capture fugitive particulate matter emissions from the enclosed portions of the batch tower, which include units Nos. 5, 6, 8, and 10, venting to the baghouse which exhausts to stack S-1;
(j) one (1) drag slat conveyor, identified as unit No. 12; and
(k) cold-mix (stockpile mix) asphalt storage piles.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, including:
  (1) one (1) propane-fired hand torch rated at 0.5 MMBtu per hour.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, including:
  (1) two (2) No. 2 distillate fuel oil-fired burners for the intank heaters, identified as unit Nos. 22A and 23A, with maximum rated capacities of 0.28 and 1.33 MMBtu per hour, respectively, each using natural gas as a back-up fuel, with unit id No. 22A exhausting through one (1) stack, identified as S-6, and unit id No. 23A, exhausting through two (2) stacks, identified as S-8A and S-8B; and
  (2) one (1) No. 2 distillate fuel oil-fired space heater, rated at 0.35 MMBtu per hour.

(c) Combustion source flame safety purging on startup.

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(g) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20ºC (68ºF), the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(h) Closed loop heating and cooling systems.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(j) Paved and unpaved roads and parking lots with public access.

(k) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(l) One (1) aggregate cold feed system, identified as unit No. 1, consisting of eight (8) bins and eight (8) feeder conveyors.

(m) One (1) Reclaimed Asphalt Pavement (RAP) feed system, identified as unit No. 2, consisting of one (1) bin, one (1) feeder conveyor, and one (1) access conveyor.

(n) One (1) hot mix storage system, identified as unit No. 13, with a maximum storage capacity of 115 tons.

(o) One (1) dust storage and metering system, identified as unit No. 18.

(p) Four (4) liquid asphalt storage tanks, identified as Tanks Nos. 20, 21, 22, and 23, with maximum storage capacities of 17,600, 19,400, 17,000, and 27,000 gallons, respectively, each exhausting through one (1) vent, identified as V-3, V-4, V-5, and V-7.

(q) Three (3) fuel oil storage tanks, identified as Tanks Nos. 24, 25, and 26, with maximum storage capacities of 10,600, 14,100, and 19,400 gallons, respectively, each exhausting through one (1) vent, identified as V-9, V-10, and V-11.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the

U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an

action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating

scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)]

The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 29, 1999. The plan consists of:

(a) Fugitive particulate matter emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following methods:

Paved roads and parking lots:
(1) power brooming while wet either from rain or application of water on an as needed basis.

Unpaved roads and parking lots:
(1) paving with asphalt;
(2) treating with emulsified asphalt on an as needed basis;
(3) treating with water on an as needed basis;
(4) double chip and seal the road surface and maintained on an as needed basis.

(b) Fugitive particulate matter emissions from aggregate stockpiles shall be controlled by one or more of the following methods on an as needed basis:

(1) maintaining minimum size and number of stock piles of aggregate;
(2) treating around the stockpile area with emulsified asphalt;
(3) treating around the stockpile area with water;
(4) treating the stockpiles with water.

(c) Fugitive particulate matter emissions from outdoor conveying of aggregates shall be controlled by the following method on an as needed basis:

(1) applying water at the feed and the intermediate points.

(d) Fugitive particulate matter emissions from the transfer of aggregates shall be controlled by one of the following methods:

(1) minimize the vehicular distance between transfer points;
(2) enclose the transfer points;
(3) apply water on transfer points on an as needed basis.

(e) Fugitive particulate matter emissions from transportation of aggregate by truck, front end loader, etc. shall be controlled by one of the following methods:

(1) tarping the aggregate hauling vehicles;
(2) maintain vehicle bodies in a condition to prevent leakage;
(3) spray the aggregates with water;
(4) maintain a 10 MPH speed limit in the yard.

(f) Fugitive particulate matter emissions from the loading and unloading of aggregate shall be controlled by one of the following methods:

(1) reduce free fall distance to a minimum;
(2) reduce the rate of discharge of the aggregate;
(3) spray the aggregate with water on an as needed basis.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within 180 days from the date on which this source commences operation).

The ERP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition

of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) one (1) aggregate rotary dryer, identified as unit No. 3, with a maximum capacity of processing 300 tons of aggregates per hour, equipped with one (1) waste oil fired aggregate dryer burner with a maximum rated capacity of 75.6 million (MM) British thermal units (Btu) per hour using No. 2 distillate fuel oil and natural gas as back-up fuels, and one (1) cyclone and one (1) baghouse in series for air pollution control, exhausting at one (1) stack, identified as S-1;
(b) one (1) No. 2 distillate fuel oil-fired hot oil heater, identified as unit No. 19, with a maximum rated capacity of 2.115 MMBtu per hour, using natural gas as a back-up fuel, exhausting at one (1) stack, identified as S-2;
(c) one (1) hot aggregate elevator, identified as unit No. 5;
(d) one (1) hot aggregate screen system, identified as unit No. 6;
(e) four (4) hot aggregate storage bins, identified as unit No. 7, with a total maximum aggregate storage capacity of 45 tons;
(f) one (1) hot aggregate weigh hopper, identified as unit No. 8;
(g) one (1) hot liquid asphalt weigh bucket, identified as unit No. 9;
(h) one (1) pug mill (mixer), identified as unit No. 10, with a maximum hot mix batch holding capacity of 8,200 pounds;
(i) one (1) batch tower fugitive dust capture system, identified as unit No. 11, used to capture fugitive particulate matter emissions from the enclosed portions of the batch tower, which include units Nos. 5, 6, 8, and 10, venting to the baghouse which exhausts to stack S-1; and
(j) one (1) drag slat conveyor, identified as unit No. 12.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.90, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the particulate matter emissions from the mixing and drying operations shall be limited to 0.04 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 13.64 pounds per hour.

D.1.2 Opacity [326 IAC 12] [40 CFR 60.90, Subpart I]

Pursuant to 326 IAC 12, (40 CFR Part 60.92, Subpart I) "Standards of Performance for Hot Mix Asphalt Facilities", the mixing and drying operations shall not discharge or cause the discharge into the atmosphere any gases which exhibit 20% opacity or greater.

D.1.3 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart I.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The production of asphalt mix from this asphalt plant shall be not exceed 1,314,000 tons per 365 consecutive day period. This production limit is required to limit the potential to emit of PM to less than 250 tons per 365 consecutive day period. During the first 365 days of operation under this permit, the production of asphalt mix from this asphalt plant shall be limited such that the total tons divided by the accumulated days of operation shall not exceed 3,600 tons per day. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.5 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the aggregate mixing and drying operation shall not exceed 14.8 pounds per hour, including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

D.1.6 Sulfur Dioxide (SO_2) [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 75.6 million Btu per hour burner for the aggregate dryer shall be limited to:

(a) 1.6 pounds per MMBtu heat input or a sulfur content of less than or equal to 1.5% when using waste oil; and

(b) 0.5 pounds per million Btu heat input or a sulfur content of less than or equal to 0.5% when using distillate oil.

D.1.7 Fuel Usage [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), the following limit shall apply:

(a) the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 75.6 MMBtu per hour burner for the aggregate dryer shall be limited to 1,631,746 U.S. gallons per 365 day period, rolled on a daily basis, so that SO_2 emissions are limited below 100 tons per year. During the first 365 days of operation under this permit, the input of waste oil and waste oil equivalents shall be limited such that the total gallons divided by the accumulated days of operation shall not exceed 4,470 U.S. gallons per day.

(b) For purposes of determining compliance, the following shall apply:

(1) every MMCF of natural gas burned shall be equivalent to 5.4 gallons of waste oil based on SO_2 emissions, such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified; and

(2) every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of waste oil based on SO_2 emissions and a maximum sulfur content of 0.5 percent such that the total gallons of waste oil and waste oil equivalent input does not exceed the limit specified.

Therefore, the requirements of 326 IAC 2-7 will not apply.

D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.10 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the waste oil sulfur content does not exceed 0.75% by weight and the No. 2 distillate fuel oil sulfur content does not exceed 0.5% by weight by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 75.6 MMBtu per hour burner for the aggregate dryer, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.1.11 Particulate Matter (PM)

The cyclone and baghouse for PM control shall be in operation at all times when the aggregate mixing and drying process is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.12 Visible Emissions Notations

(a) Visible emission notations of the aggregate dryer and batch tower baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.13 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the aggregate dryer and batch tower, at least once daily when the aggregate mixing and drying process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.14 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the aggregate dryer and batch tower when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.15 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the aggregate dryer and batch tower when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.16 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within twelve (12) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within twelve (12) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.17 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.18 Record Keeping Requirements

(a) To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications.

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.1.12, the Permittee shall maintain records of visible emission notations of the aggregate dryer and batch tower baghouse stack exhaust once per shift.

(c) To document compliance with Condition D.1.13, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure.

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(d) To document compliance with Conditions D.1.14 and D.1.15, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.14 and D.1.15 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.19 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.4 and D.1.7, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.20 Used Oil Requirements

The waste oil burned in the aggregate dryer burner shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:

(a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),

(b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and

(c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).

The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(k) cold-mix (stockpile mix) asphalt storage piles.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-2]

Pursuant to 326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving), the use of cutback asphalt or asphalt emulsion shall not contain more than seven percent (7%) oil distillate by volume of emulsion for any paving application except the following purposes:

1) penetrating prime coating
2) stockpile storage
3) application during the months of November, December, January, February and March.

D.2.2 Cold-Mix (Stockpile Mix) VOC Usage [326 IAC 2-8-4]

The VOC usage in the production of cold mix (stockpile mix) asphalt shall be limited to 89.3 tons per 365 consecutive day period, rolled on a daily basis. The total for each day shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous 364 days. This is equivalent to 94.0 tons of diluent used per 365 day period in the production of cold mix (stockpile mix) asphalt based on 95% volatilization. During the first 365 days of operation under this permit, the usage of diluent shall be limited such that the total usage divided by the accumulated days of operation shall not exceed 515 pounds per day. Therefore, the requirements of 326 IAC 2-7 will not apply.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.4 Record Keeping Requirements

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.

(1) diluent used in production of cold mix asphalt per day;

(2) amount of diluent used last 365 days;

(3) type of liquid binder used; and

(4) percent diluent (oil distillate) in liquid binder.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Milestone Contractors, L.P.
Source Address: 88 West US 24, Kentland, Indiana 47951
Mailing Address: 5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, Indiana 46242-1459
FESOP No.: F111-11388-00018

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Milestone Contractors, L.P.
Source Address: 88 West US 24, Kentland, Indiana 47951
Mailing Address: 5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, Indiana 46242-1459
FESOP No.: F111-11388-00018

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) ĆThe Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and ĆThe Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) ĆThe Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Monthly Report

Source Name: Milestone Contractors, L.P.
Source Address: 88 West US 24, Kentland, Indiana 47951
Mailing Address: 5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, Indiana 46242-1459
FESOP No.: F111-11388-00018
Facility: 75.6 MMBtu per hour burner for the aggregate dryer
Parameter: Sulfur Dioxide (SO_2)
Limit: the input of waste oil with a maximum sulfur content of 0.75% and waste oil equivalents to the 75.6 MMBtu per hour burner for the aggregate dryer shall be limited to 1,631,746 U.S. gallons per 365 day period, rolled on a daily basis. For purposes of determining compliance, every MMCF of natural gas burned shall be equivalent to 5.4 gallons of waste oil based on SO_2 emissions, and every 1,000 gallons of No. 2 distillate fuel oil burned shall be equivalent to 644.0 gallons of waste oil based on SO_2 emissions and a maximum sulfur content of 0.5 percent.

Month: _____ **Year:** _____

Day	Fuel Type	Waste Oil and Equivalent Usage This Day (gallons)	Waste Oil and Equivalent Usage Last 364 Days (gallons/day)	365 Day Total Waste Oil and Equivalent Usage (gallons)	Day	Fuel Type	Waste Oil and Equivalent Usage This Day (gallons)	Waste Oil and Equivalent Usage Last 364 Days (gallons/day)	365 Day Total Waste Oil and Equivalent Usage (gallons)
1					17				
2					18				
3					19				
4					20				
5					21				
6					22				
7					23				
8					24				
9					25				
10					26				
11					27				
12					28				
13					29				
14					30				
15					31				
16									

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Monthly Report

Source Name: Milestone Contractors, L.P.
Source Address: 88 West US 24, Kentland, Indiana 47951
Mailing Address: 5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, Indiana 46242-1459
FESOP No.: F111-11388-00018
Facility: aggregate dryer
Parameter: Particulate Matter (PM)
Limit: The production of asphalt mix from this asphalt plant shall be not exceed 1,314,000 tons per 365 consecutive day period. During the first 365 days of operation under this permit, the production of asphalt mix from this asphalt plant shall be limited such that the total tons divided by the accumulated days of operation shall not exceed 3,600 tons per day.

Month: _____ **Year:** _____

Day	Asphalt Mix Throughput (tons)	Day	Asphalt Mix Throughput (tons)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Monthly Report

Source Name: Milestone Contractors, L.P.
Source Address: 88 West US 24, Kentland, Indiana 47951
Mailing Address: 5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, Indiana 46242-1459
FESOP No.: F111-11388-00018
Facility: cold-mix (stockpile mix) asphalt storage piles
Parameter: volatile organic compounds (VOC)
Limit: The VOC usage in the production of cold mix (stockpile mix) asphalt shall be limited to 89.3 tons per 365 consecutive day period, rolled on a daily basis. This is equivalent to 94.0 tons of diluent used per 365 day period in the production of cold mix (stockpile mix) asphalt based on 95% volatilization. During the first 365 days of operation under this permit, the usage of diluent shall be limited such that the total usage divided by the accumulated days of operation shall not exceed 515 pounds per day.

Month: _____ **Year:** _____

Day	Diluent Usage This Day (tons)	Diluent Usage Last 364 days (tons)	365 Day Total Diluent Usage (tons)	Day	Diluent Usage This Day (tons)	Diluent Usage Last 364 days (tons)	365 Day Total Diluent Usage (tons)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16							

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Milestone Contractors, L.P.
Source Address: 88 West US 24, Kentland, Indiana 47951
Mailing Address: 5950 S. Belmont Avenue, P.O. Box 421459, Indianapolis, Indiana 46242-1459
FESOP No.: F111-11388-00018

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name: **Milestone Contractors, L.P.**
Source Location: **88 West US 24, Kentland, Indiana 47951**
County: **Newton**
SIC Code: **2951**
Operation Permit No.: **F111-11388-00018**
Permit Reviewer: **Trish Earls/EVP**

The Office of Air Management (OAM) has reviewed a FESOP application from Milestone Contractors, L.P. relating to the operation of a stationary batch mix asphalt plant.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(a) one (1) aggregate rotary dryer, identified as unit No. 3, with a maximum capacity of processing 300 tons of aggregates per hour, equipped with one (1) waste oil fired aggregate dryer burner with a maximum rated capacity of 75.6 million (MM) British thermal units (Btu) per hour using No. 2 distillate fuel oil and natural gas as back-up fuels, and one (1) cyclone and one (1) baghouse in series for air pollution control, exhausting at one (1) stack, identified as S-1;
(b) one (1) No. 2 distillate fuel oil-fired hot oil heater, identified as unit No. 19, with a maximum rated capacity of 2.115 MMBtu per hour, using natural gas as a back-up fuel, exhausting at one (1) stack, identified as S-2;
(c) one (1) hot aggregate elevator, identified as unit No. 5;
(d) one (1) hot aggregate screen system, identified as unit No. 6;
(e) four (4) hot aggregate storage bins, identified as unit No. 7, with a total maximum aggregate storage capacity of 45 tons;
(f) one (1) hot aggregate weigh hopper, identified as unit No. 8;
(g) one (1) hot liquid asphalt weigh bucket, identified as unit No. 9;

(h) one (1) pug mill (mixer), identified as unit No. 10, with a maximum hot mix batch holding capacity of 8,200 pounds;
(i) one (1) batch tower fugitive dust capture system, identified as unit No. 11, used to capture fugitive particulate matter emissions from the enclosed portions of the batch tower, which include units Nos. 5, 6, 8, and 10, venting to the baghouse which exhausts to stack S-1;
(j) one (1) drag slat conveyor, identified as unit No. 12; and
(k) cold-mix (stockpile mix) asphalt storage piles.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, including:
  (a) one (1) propane-fired hand torch rated at 0.5 MMBtu per hour.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, including:
  (a) two (2) No. 2 distillate fuel oil-fired burners for the in-tank heaters, identified as unit Nos. 22A and 23A, with maximum rated capacities of 0.28 and 1.33 MMBtu per hour, respectively, each using natural gas as a back-up fuel, with unit id No. 22A exhausting through one (1) stack, identified as S-6, and unit id No. 23A, exhausting through two (2) stacks, identified as S-8A and S-8B; and
  (b) one (1) No. 2 distillate fuel oil-fired space heater, rated at 0.35 MMBtu per hour.

(c) Combustion source flame safety purging on startup.

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (five gallon bucket for maintenance purposes only).

(g) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20ºC (68ºF), the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(h) Closed loop heating and cooling systems.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(j) Paved and unpaved roads and parking lots with public access.

(k) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(l) One (1) aggregate cold feed system, identified as unit No. 1, consisting of eight (8) bins and eight (8) feeder conveyors.

(m) One (1) Reclaimed Asphalt Pavement (RAP) feed system, identified as unit No. 2, consisting of one (1) bin, one (1) feeder conveyor, and one (1) access conveyor.

(n) One (1) hot mix storage system, identified as unit No. 13, with a maximum storage capacity of 115 tons.

(o) One (1) dust storage and metering system, identified as unit No. 18.

(p) Four (4) liquid asphalt storage tanks, identified as Tanks Nos. 20, 21, 22, and 23, with maximum storage capacities of 17,600, 19,400, 17,000, and 27,000 gallons, respectively, each exhausting through one (1) vent, identified as V-3, V-4, V-5, and V-7.

(q) Three (3) fuel oil storage tanks, identified as Tanks Nos. 24, 25, and 26, with maximum storage capacities of 10,600, 14,100, and 19,400 gallons, respectively, each exhausting through one (1) vent, identified as V-9, V-10, and V-11.

Enforcement Issue

Although this asphalt plant was constructed in 1967, it has never been operated in Indiana. Therefore, this is a new source and there are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on September 29, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (13 pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	42,518.88
PM-10	6,103.92
SO_2	269.82
VOC	44,168.31
CO	29.81
NO_x	54.02

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Acetaldehyde	less than 10
Arsenic	less than 10
Benzene	less than 10
Beryllium	less than 10
Cadmium	less than 10
Chromium	less than 10
Cobalt	less than 10
Ethylbenzene	less than 10
Formaldehyde	less than 10
Lead	less than 10
Manganese	less than 10
Mercury	less than 10
Nickel	less than 10
Quinone	less than 10
Selenium	less than 10
Toluene	less than 10
Total POM	less than 10
Xylene	less than 10
TOTAL	less than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10, SO_2, and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Aggregate Dryer	59.75	64.92	89.95	9.47	27.81	33.11	7.65
Hot Oil Heater	0.13	0.07	4.70	0.05	0.78	1.32	0.0
Conveying/Handling	1.56	0.74	0.0	0.0	0.0	0.0	0.0
Unpaved Roads	156.25	32.99	0.0	0.0	0.0	0.0	0.0
Aggregate Storage	0.24	0.08	0.0	0.0	0.0	0.0	0.0
Cold-Mix Storage	0.0	0.0	0.0	89.28	0.0	0.0	0.0
Insignificant Combustion Units	0.24	0.19	4.35	0.19	1.21	5.40	0.0
Total Emissions	218.17	99.0	99.0	99.0	29.80	39.83	7.65

County Attainment Status

The source is located in Newton County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Newton County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) This source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.90, Subpart I) because it meets the definition of a hot mix asphalt facility pursuant to the rule and it was constructed after June 11, 1973. This rule limits particulate matter emissions to 0.04 grains per dry standard cubic foot (gr/dscf) and also limits visible emissions to 20% opacity. This is equivalent to a particulate matter emission rate of 13.64 pounds per hour. The source will comply with this rule by using a baghouse to limit particulate matter emissions to less than 0.04 gr/dscf (see Appendix A, page 13 of 13, for detailed calculations).

(b) The 17,000 gallon asphalt storage tank, identified as Tank 22, constructed in 1970, and the 27,000 gallon asphalt storage tank, identified as Tank 23, constructed in 1974, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subpart K) because Tank 22 was constructed prior to June 11, 1973, and each tank has a storage capacity less than 40,000 gallons.

(c) The 17,600 gallon asphalt storage tank, identified as Tank 20, constructed in 1979, and the 19,400 gallon asphalt storage tank, identified as Tank 21, constructed in 1980, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110a, Subpart Ka) because each tank has a storage capacity less than 40,000 gallons.

(d) The 10,600 gallon fuel oil storage tank, identified as Tank 24, constructed in 1980, the 14,100 gallon fuel oil storage tank, identified as Tank 25, constructed in 1980, and the 19,400 gallon fuel oil storage tank, identified as Tank 26, constructed in 1978, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110a, Subpart Ka) because each tank has a storage capacity less than 40,000 gallons.

(e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source, which is located in Newton County, has accepted federally enforceable operation conditions which limit emissions of PM-10, SO_2, and VOC to below 100 tons per year per pollutant, therefore, 326 IAC 2-6 does not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)

The throughput of aggregate to this asphalt plant shall be limited to 1,314,000 tons per 365 day period, rolled on a daily basis. This throughput limitation will limit source-wide PM emissions, including fugitive emissions, to less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the usage of waste oil with a sulfur content of 0.75% and waste oil equivalents in the 75.6 MMBtu per hour burner for the aggregate dryer shall be limited to 1,631,746 U.S. gallons per 365 day period, rolled on a daily basis, so that SO_2 emissions are limited below 100 tons per year. The VOC usage in the production of cold mix (stockpile mix) asphalt shall be limited to 89.28 tons per 365 day period, rolled on a daily basis. This is equivalent to 93.98 tons of diluent used per 365 day period in the production of cold mix (stockpile mix) asphalt based on 95% volatilization. Also, PM-10 emissions from the aggregate dryer shall be limited to 14.82 pounds per hour. The source will comply with the PM-10 emission limit by utilizing a cyclone and baghouse in series for controlling PM-10 emissions to less than 14.82 pounds per hour from the aggregate dryer. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is subject to 326 IAC 6-5 for fugitive particulate matter emissions. Pursuant to 326 IAC 6-5, for any new source which has not received all the necessary preconstruction approvals before December 13, 1985, a fugitive dust control plan must be submitted, reviewed and approved. The fugitive dust control plan for this source includes the following:

(a) Fugitive particulate matter emissions from paved roads, unpaved roads, and parking lots shall be controlled by one or more of the following methods:

Paved roads and parking lots:
(1) power brooming while wet either from rain or application of water on an as needed basis.

Unpaved roads and parking lots:
(1) paving with asphalt;
(2) treating with emulsified asphalt on an as needed basis;
(3) treating with water on an as needed basis;
(4) double chip and seal the road surface and maintained on an as needed basis.

(b) Fugitive particulate matter emissions from aggregate stockpiles shall be controlled by one or more of the following methods on an as needed basis:

(1) maintaining minimum size and number of stock piles of aggregate;
(2) treating around the stockpile area with emulsified asphalt;
(3) treating around the stockpile area with water;
(4) treating the stockpiles with water.

(c) Fugitive particulate matter emissions from outdoor conveying of aggregates shall be controlled by the following method on an as needed basis:

(1) applying water at the feed and the intermediate points.

(d) Fugitive particulate matter emissions from the transfer of aggregates shall be controlled by one of the following methods:

(1) minimize the vehicular distance between transfer points;
(2) enclose the transfer points;
(3) apply water on transfer points on an as needed basis.

(e) Fugitive particulate matter emissions from transportation of aggregate by truck, front end loader, etc. shall be controlled by one of the following methods:

(1) tarping the aggregate hauling vehicles;

(2) maintain vehicle bodies in a condition to prevent leakage;
(3) spray the aggregates with water;
(4) maintain a 10 MPH speed limit in the yard.

(f) Fugitive particulate matter emissions from the loading and unloading of aggregate shall be controlled by one of the following methods:

(1) reduce free fall distance to a minimum;
(2) reduce the rate of discharge of the aggregate;
(3) spray the aggregate with water on an as needed basis.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

The aggregate mixing and drying operation is not subject to the requirements of 326 IAC 6-3-2. This rule does not apply if the limitation established in the rule is not consistent with applicable limitations in 326 IAC 6-1 or 326 IAC 12. Since the applicable PM limit established by 326 IAC 12, 40 CFR 60, Subpart I, is less than the PM limit that would be established by 326 IAC 6-3-2 (63.0 pounds per hour, see Appendix A, page 13 of 13), the more stringent limit applies and the limit pursuant to 326 IAC 6-3-2 does not apply.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The sulfur dioxide emissions from the 75.6 MMBtu/hr dryer burning waste oil shall be limited to 1.6 pounds per MMBtu heat input. This equates to a fuel oil sulfur content limit of 1.5%. Therefore, the sulfur content of the fuel must be less than or equal to 1.5% in order to comply with this rule (See Appendix A, Page 13 of 13 for detailed calculations). The source will comply with this rule by using waste oil with a sulfur content of 0.75% or less. The sulfur dioxide emissions from the 75.6 MMBtu/hr dryer burning distillate oil shall be limited to 0.5 lb/MMBtu heat input. This equates to a fuel oil sulfur content limit of 0.5%. Therefore, the sulfur content of the fuel must be less than or equal to 0.5% in order to comply with this rule (See Appendix A, Page 13 of 13 for detailed calculations). The source will comply with this rule by using No. 2 distillate fuel oil with a sulfur content of 0.5% or less.

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

This source is subject to 326 IAC 7-2-1 (Reporting Requirements). This rule requires the source to submit to the Office of Air Management upon request records of sulfur content, heat content, fuel consumption, and sulfur dioxide emission rates based on a calendar-month average.

326 IAC 8-5-2 (Miscellaneous Operations: Asphalt Paving)

No person shall cause or allow the use of cutback asphalt or asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion for any paving application except the following purposes:

1) penetrating prime coating
2) stockpile storage
3) application during the months of November, December, January, February and March.

This source manufactures stockpile mix for stockpile storage only, therefore, there is no limit on the % of oil distillate in the liquid asphalt used. The source is in compliance with 326 IAC 8-5-2.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a

result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The mixing and drying operation has applicable compliance monitoring conditions as specified below:

   (a) Visible emissions notations of the aggregate dryer and batch tower baghouse stack exhaust shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

   (b) The Permittee shall record the total static pressure drop across the baghouse controlling the aggregate dryer and batch tower, at least once daily when the aggregate dryer and batch tower are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 8.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

   These monitoring conditions are necessary because the baghouse for the aggregate mixing and drying process must operate properly to ensure compliance with 326 IAC 12, 40 CFR 60.90, Subpart I (Standards of Performance for Hot Mix Asphalt Facilities) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations. (Appendix A, page 11 of 13)

Conclusion

The operation of this batch mix asphalt plant shall be subject to the conditions of the attached proposed **(FESOP No.: F111-11388-00018).**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: **Milestone Contractors, L.P.**
Source Location: **88 West US 24, Kentland, Indiana 47951**
County: **Newton**
SIC Code: **2951**
Operation Permit No.: **F111-11388-00018**
Permit Reviewer: **Trish Earls/EVP**

On December 8, 1999, the Office of Air Management (OAM) had a notice published in the Newton County Enterprise, Kentland, Indiana, stating that Milestone Contractors, L.P. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary batch mix asphalt plant. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On December 27, 1999, Denis Drysdale submitted comments on behalf of Milestone Contractors, L.P. The summary of the comments and responses is as follows:

Comment #1

Section D.1, Condition D.1.4, PSD Minor Limit (326 IAC 2-2) (40 CFR 52.21)
We see tons of product (asphalt mix) as the parameter for limiting throughput of aggregate dryers in current and proposed IDEM permits for asphalt plants, and note that the emission factors for PM and PM-10 in AP-42, 11.1 Hot Mix Asphalt Plants are per ton of product (asphalt mix). We suggest wording changes in this condition to reflect the industry's most significant accounting parameter tons of product (asphalt mix):

"The production of asphalt mix from this asphalt plant shall not exceed 1,314,000 tons per 365 consecutive day period. This production limit is required to limit the potential to emit of PM to less than 250 tons per 365 consecutive day period. During the first 365 days of operation under this permit, the production of asphalt mix from this asphalt plant shall be limited such that the total tons divided by the accumulated days of operation shall not exceed 3,600 tons per day. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable."

Response #1

Since PM emissions from aggregate drying are based on the tons of product from the aggregate dryer, the limit will be revised to state the limit in terms of asphalt mix produced. Condition D.1.4 is now revised to read as follows (additions in bold, deletions in strikeout):

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The ~~input of aggregate to the aggregate dryer~~ **production of asphalt mix from this asphalt plant** shall be not exceed 1,314,000 tons per 365 consecutive day period. This ~~usage~~ **production** limit is required to limit the potential to emit of PM to less than 250 tons per 365 consecutive day period. During the first 365 days of operation under this permit, the ~~input of aggregate to the dryer~~ **production of asphalt mix from this asphalt plant** shall be limited such that the total tons divided by the accumulated days of operation shall not exceed 3,600 tons per day. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Comment #2

Section D.1, Condition D.1.16, Broken or Failed Bag Detection
We ask that the eight (8) hours be changed to twelve (12) hours which could be a sometime shift, and which IDEM has no problem with in written comments the Industry submitted on the model compliance monitoring plan for fabric filter for asphalt plants, attached.

Response #2

Included with these comments, received on December 27, 1999, is a letter from Ed Stresino of the OAM written on June 17, 1996, to Lloyd Bandy of the asphalt pavement association addressing comments the association made on the model Compliance Monitoring Plan prepared by the OAM. In the letter, Mr. Stresino did not have a problem changing the response time from 8 hours to 12 hours. Therefore, the response time required in the event of baghouse failure in condition D.1.16 shall be changed from 8 hours to 12 hours. The revised condition now reads as follows (changes in bold or strikeout):

D.1.16 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within ~~eight (8)~~ **twelve (12)** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within ~~eight (8)~~ **twelve (12)** hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Comment #3

Section D.2, Condition D.2.2, Cold Mix (Stockpile Mix) VOC Usage (326 IAC 2-8-4)
As per this condition it appears to us that the diluent per day would be 515 pounds per day instead of 489 pounds per day.

Response #3

The limited diluent usage per day in condition D.2.2 should be 515 pounds per day. Therefore, condition D.2.2 is revised to read as follows (additions in bold, deletions in strikeout):

D.2.2 Cold-Mix (Stockpile Mix) VOC Usage [326 IAC 2-8-4]

The VOC usage in the production of cold mix (stockpile mix) asphalt shall be limited to 89.3 tons per 365 consecutive day period, rolled on a daily basis. The total for each day shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous 364 days. This is equivalent to 94.0 tons of diluent used per 365 day period in the production of cold mix (stockpile mix) asphalt based on 95% volatilization. During the first 365 days of operation under this permit, the usage of diluent shall be limited such that the total usage divided by the accumulated days of operation shall not exceed ~~489~~ **515** pounds per day. Therefore, the requirements of 326 IAC 2-7 will not apply.

Comment #4

Page 40 of 42, FESOP Monthly Report
We suggest wording changes to reflect our suggested wording changes in Condition D.1.4:
Limit: The production of asphalt mix from this asphalt plant shall not exceed 1,314,000 tons per 365 day consecutive period. In the description boxes the wording would change to: Aphalt Mix Throughput (tons).

Response #4

The Monthly Report form on page 40 of 42 of the FESOP has been revised as suggested. Also, the daily production limit during the first 365 days of operation under this permit has been added to the limit on the report form. The limit on the report form now reads as follows (additions in bold, deletions in strikeout):

Limit: The ~~input of aggregate to the aggregate dryer~~ **production of asphalt mix from this asphalt plant** shall be not exceed 1,314,000 tons per 365 consecutive day period. **During the first 365 days of operation under this permit, the production of asphalt mix from this asphalt plant shall be limited such that the total tons divided by the accumulated days of operation shall not exceed 3,600 tons per day.**

Comment #5

Pg 41 of 42, FESOP Monthly Report
Limit: as per this wording it appears to us that the diluent per day would be 515 pounds per day instead of 489 pounds per day.

Response #5

The Monthly Report form on page 41 of 42 of the FESOP is revised to show the correct diluent usage limit as stated above.

Comment #6

TSD, page 5 of 10, Limited Potential to Emit
With a limited production of 1,314,000 tons of asphalt mix we calculate the allowable particulate emissions for the aggregate dryer under NSPS to be 29.79 TPY, PM or half the amount listed. Again in consideration of a limited production of 1,314,000 tons of asphalt mix and then 50% emitted after controls we calculated to Conveying/Handling to be 0.78 TPY, PM; Unpaved Roads 78.13 TPY, PM.

Response #6

The allowable particulate matter emissions for the aggregate dryer pursuant to 40 CFR 60.90, Subpart I, is 0.04 grains per dry standard cubic foot (gr/dscf) regardless of any production limits on the source. Based on the design exhaust flow rate from the baghouse exhausting to stack S-1, this is equivalent to an allowable PM emission rate of 13.64 pounds per hour or a maximum of 59.75 tons of PM per year based on 8,760 hours of operation per year. This is the maximum allowable PM emission rate listed in the Limited Potential to Emit table on page 5 of 10 of the TSD, for the aggregate dryer. The production limit of 1,314,000 tons of asphalt mix per year was applied to the entire source to limit PM emissions below 250 tons per year to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). This production limit is a 50% reduction in the maximum capacity of the plant. Therefore, a 50% reduction was applied to all PM emissions, except those from combustion sources, when calculating the source wide controlled emissions in Appendix A, page 10 of 13. However, since the aggregate dryer could emit the maximum allowable 59.75 tons of PM per year without causing the source wide PM emissions to exceed 250 tons per year, this was listed as the maximum allowable PM emissions for the aggregate dryer.

The conveying/handling and unpaved road limited potential emissions in the table represent the potential emissions reduced by 50% because of the production limit mentioned above. The additional 50% control efficiency for fugitive emission sources that is typically assumed in calculating controlled emissions from asphalt plants was not applied in the table because that is not a federally enforceable control requirement and therefore, can not be used in a federally enforceable source limit such as the FESOP limit. Potential emissions can be reduced by 50% to reflect the production limit because the production limit is a federally enforceable limit.

The table was not changed as a result of this comment. However, the limited potential PM emissions from aggregate storage were increased by 50% to 0.48 ton per year because the production limit does not affect the maximum storage capacity of the storage piles and therefore, does not affect allowable PM emissions from the storage piles.

Comment #7

TSD, page 6 of 10, State Rule Applicability - Entire Source, 326 IAC 2-2 (Prevention of Significant Deterioration)
We suggest wording changes to reflect our suggested wording changes in Condition D.1.4:

“The throughput of asphalt mix from this asphalt plant shall be limited to 1,314,000 tons per 365 day period, rolled on a daily basis. This throughput limitation will limit source-wide PM emissions including, fugitive emissions, to less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 do not apply.”

Response #7

The paragraph under the State Rule Applicability - Entire Source section of the TSD on page 6 of 10, discussing the applicability of 326 IAC 2-2 (Prevention of Significant Deterioration) is now revised to read as follows:

326 IAC 2-2 (Prevention of Significant Deterioration)

The ~~throughput of aggregate to~~ **production of asphalt mix from** this asphalt plant shall be limited to 1,314,000 tons per 365 day period, rolled on a daily basis. This ~~throughput~~ **production** limitation will limit source-wide PM emissions, including fugitive emissions, to less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 do not apply.

Comment #8

Emission Calculations, page 10 of 13, Source Emissions After Controls
With a limited production of 1,314,000 tons of asphalt mix, which is equivalent to 4,380 hours of use we calculate:

Aggregate drying: non fugitive
PM: 21024.00 ton/yr (limited) x 0.03% emitted after controls = 6.31 ton/yr
PM-10: 2956.50 ton/yr (limited)x 0.03% emitted after controls = 0.89ton/yr
VOC: 7.65 ton/yr (limited) x 100.00% emitted after controls = 7.65 ton/yr

Conveying/handling: fugitive
PM: 1.56 ton/yr (limited) x 50.00% emitted after controls = 0.78 ton/yr
PM-10: 0.74 ton/yr (limited) x 100.00% emitted after controls = 0.74 ton/yr

Unpaved/roads: fugitive
PM: 156.25 ton/yr (limited) x 50.00% emitted after controls = 78.13 ton/yr
PM-10: 32.99 ton/yr (limited) x 100.00% emitted after controls = 32.29 ton/yr

Storage Piles: fugitive
PM: 0.48 ton/yr x 50.00% emitted after controls = 0.24 ton/yr
PM-10: 0.17ton/yr x 100.00%emitted after controls = 0.17ton/yr

Cold mix VOC storage: fugitive
VOC: 22075.20 ton/yr (limited), 93.98 Limited Diluent Throughput (ton/yr) = 89.28 ton/yr

NOTE: To insure that PM emissions do not exceed 250 tons per year the “Asphalt Mix” throughput from the plant will be limited to 1,314,000 tons per year (50% of max), therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

Emission Calculations, page 10 of 13, Summary of Source Emissions After Controls.
Please revise with numbers that take into consideration a limited production of 1,314,000 tons of asphalt mix as listed above.

Response #8

The Source Emissions After Controls section of Appendix A, page 10 of 13, did include a 50% reduction in emissions due to the production limit. However, the additional 50% control of fugitive PM emission sources was not included in the final controlled emissions calculations. Also, as noted above, the 50% reduction in emissions due to the production limit was erroneously applied to the storage pile emissions. Therefore, the controlled emissions on page 10 of 13 of Appendix A were revised as noted above.

Comment #9

Emission calculations, page 11 of 13, Note
We suggest wording changes to reflect our suggested wording changes in Condition D.1.4:

Note: Limited HAP emissions include a limit on asphalt mix throughput of 1,314,000 tons per year.

Response #9

The note on page 11 of 13 of Appendix A has been revised as requested.

Comment #10

Emission Calculations, page 13 of 13, PM-10 Emission Limit for Aggregate Dryer
In consideration of the asphalt mix throughput being limited to 1,314,000 tons, and the fugitive emissions from other sources uncontrolled we calculated:
(99.0 tons PM-10/yr - 34.2 tons PM-10/yr from other sources)
= 64.8 tons PM-10/yr = 14.80 lbs/hr

Response #10

The PM-10 allowable emission limit to comply with 326 IAC 2-8 has been revised as requested. Since the allowable emissions limit changed from 14.82 pounds per hour to 14.80 pounds per hour, the PM-10 limit for the aggregate dryer as listed in the Limited Potential to Emit table of the TSD will be changed to 64.83 tons per year. Also, the limit stated in the paragraph in the TSD under the State Rule Applicability section, which discusses the applicability of 326 IAC 2-8 (FESOP), is revised as follows:

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the usage of waste oil with a sulfur content of 0.75% and waste oil equivalents in the 75.6 MMBtu per hour burner for the aggregate dryer shall be limited to 1,631,746 U.S. gallons per 365 day period, rolled on a daily basis, so that SO_2 emissions are limited below 100 tons per year. The VOC usage in the production of cold mix (stockpile mix) asphalt shall be limited to 89.28 tons per 365 day period, rolled on a daily basis. This is equivalent to 93.98 tons of diluent used per 365 day period in the production of cold mix (stockpile mix) asphalt based on 95% volatilization. Also, PM-10 emissions from the aggregate dryer shall be limited to ~~14.82~~ **14.80** pounds per hour. The source will comply with the PM-10 emission limit by utilizing a cyclone and baghouse in series for controlling PM-10 emissions to less than ~~14.82~~ **14.80** pounds per hour from the aggregate dryer. Therefore, the requirements of 326 IAC 2-7 do not apply.

Comment #11

Emission Calculations, Pg 13 of 13, 40 CFR Part 60.90, Subpart I (Standards of Performance for Hot Mix Asphalt Plants) Compliance Calculations:

In consideration of the asphalt mix throughput being limited to 1,314,000 tons, which is equivalent to 4380 hours of use we calculate:

6.31 ton/vr*. 2000 lb/ton * 7000 gr/lb = 0.008 gr/dscf (will comply)
262800 min/yr* 39,790 dscf/min

Allowable particulate emissions under NSPS equate to 29.79 tons per year or 13.64 lbs/hr.

Response #11

This source is limited to an asphalt mix throughput of 1,314,000 tons per year so that PM emissions are limited below 250 tons per year. There is no limit on the hours of operation of the plant as long as the total throughput of asphalt mix does not exceed 1,314,000 tons per year. Since there is no limit on hours of operation stated in the permit, the 40 CFR 60, Subpart I compliance calculations and allowable emission limit are based on a maximum of 8,760 hours of operation per year. Therefore, these calculations will remain unchanged.

Company Name: Milestone Contractors, L.P.
Plant Location: 88 West US 24, Kentland, Indiana 47951
County: Newton
Date Received: September 29, 1999
Permit Reviewer: Trish Earls

**** aggregate dryer burner****

The following calculations determine the amount of emissions created by natural gas combustion, from the aggregate dryer burner, based on 8,760 hours of operation and US EPA's AP-42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1 and 1.4-2.

Criteria Pollutant: $\frac{75.6 \text{ MMBtu/hr} * 8{,}760 \text{ hr/yr}}{1000 \text{ Btu/cf} * 2{,}000 \text{ lb/ton}}$ * Ef (lb/MMcf) = (ton/yr)

***P M:**	1.9 lb/MMcf =	**0.63**	**ton/yr**
***P M-10:**	7.6 lb/MMcf =	**2.52**	**ton/yr**
S O 2:	0.6 lb/MMcf =	**0.20**	**ton/yr**
N O x:	100.0 lb/MMcf =	**33.11**	**ton/yr**
V O C:	5.5 lb/MMcf =	**1.82**	**ton/yr**
C O:	84.0 lb/MMcf =	**27.81**	**ton/yr**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil
@ 0.50 % sulfur, from the aggregate dryer burner, based on 8,760 hours of use and
US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-3, and 1.3-7.

Criteria Pollutant: $\frac{75.6 \text{ MMBtu/hr} * 8{,}760 \text{ hr/yr}}{140{,}000 \text{ Btu/gal} * 2{,}000 \text{ lb/ton}}$ * Ef (lb/1,000 gal) = (ton/yr)

P M:	2.0 lb/1000 gal =	**4.73**	**ton/yr**
P M-10:	1.1 lb/1000 gal =	**2.55**	**ton/yr**
S O 2:	71.0 lb/1000 gal =	**167.93**	**ton/yr**
N O x:	20.0 lb/1000 gal =	**47.30**	**ton/yr**
V O C:	0.20 lb/1000 gal =	**0.47**	**ton/yr**
C O:	5.0 lb/1000 gal =	**11.83**	**ton/yr**

The following calculations determine the amount of emissions created by the combustion of waste oil
@ 0.75 % sulfur, 1.020 % ash, based on 8,760 hours of use and
US EPA's AP-42, 5th Edition, Section 1.11 - Waste Oil Combustion, Tables 1.11-1, 1.11-2, and 1.11-3.

Criteria Pollutant: $\frac{75.6 \text{ MMBtu/hr} * 8760 \text{ hr/yr}}{140{,}000 \text{ Btu/gal} * 2000 \text{ lb/ton}}$ * Ef (lb/1000 gal) = (ton/yr)

P M:	65.3 lb/1000 gal =	**154.40**	**ton/yr**
P M-10:	52.0 lb/1000 gal =	**123.04**	**ton/yr**
S O 2:	110.3 lb/1000 gal =	**260.76**	**ton/yr**
N O x:	19.0 lb/1000 gal =	**44.94**	**ton/yr**
V O C:	1.0 lb/1000 gal =	**2.37**	**ton/yr**
C O:	5.0 lb/1000 gal =	**11.83**	**ton/yr**

The maximum potential emissions from the aggregate dryer burner due to fuel combustion are the following:

Criteria Pollutant:		**Worst Case Fuel**
P M:	**154.40 ton/yr**	Waste Oil
P M-10:	**123.04 ton/yr**	Waste Oil
S O 2:	**260.76 ton/yr**	Waste Oil
N O x:	**47.30 ton/yr**	No. 2 Distillate Oil

V O C:	**2.37**	**ton/yr**	Waste Oil
C O:	**27.81**	**ton/yr**	Natural Gas

****hot oil heater****

The following calculations determine the amount of emissions created by natural gas combustion, from the hot oil heater, based on 8,760 hours of operation and US EPA's AP-42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1 and 1.4-2.

Criteria Pollutant: $\frac{2.115 \text{ MMBtu/hr} * 8{,}760 \text{ hr/yr}}{1000 \text{ Btu/cf} * 2{,}000 \text{ lb/ton}}$ * Ef (lb/MMcf) = (ton/yr)

P M:	1.9	lb/MMcf =	**0.02 ton/yr**
P M-10:	7.6	lb/MMcf =	**0.07 ton/yr**
S O 2:	0.6	lb/MMcf =	**0.01 ton/yr**
N O x:	100.0	lb/MMcf =	**0.93 ton/yr**
V O C:	5.5	lb/MMcf =	**0.05 ton/yr**
C O:	84.0	lb/MMcf =	**0.78 ton/yr**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil @ 0.50 % sulfur, from hot oil heater, based on 8760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-3, and 1.3-7.

Criteria Pollutant: $\frac{2.115 \text{ MMBtu/hr} * 8{,}760 \text{ hr/yr}}{140{,}000 \text{ Btu/gal} * 2{,}000 \text{ lb/ton}}$ * Ef (lb/1,000 gal) = (ton/yr)

P M:	2.0	lb/1000 gal =	**0.13 ton/yr**
P M-10:	1.1	lb/1000 gal =	**0.07 ton/yr**
S O 2:	71.0	lb/1000 gal =	**4.70 ton/yr**
N O x:	20.0	lb/1000 gal =	**1.32 ton/yr**
V O C:	0.34	lb/1000 gal =	**0.02 ton/yr**
C O:	5.0	lb/1000 gal =	**0.33 ton/yr**

The maximum potential emissions from the hot oil heater due to fuel combustion are the following:

Criteria Pollutant:		**Worst Case Fuel**
P M:	**0.13 ton/yr**	Distillate Oil
P M-10:	**0.07 ton/yr**	Distillate Oil/Natural G
S O 2:	**4.70 ton/yr**	Distillate Oil
N O x:	**1.32 ton/yr**	Distillate Oil
V O C:	**0.05 ton/yr**	Natural Gas
C O:	**0.78 ton/yr**	Natural Gas

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****insignificant combustion sources****

Insignificant combustion units at this source include two (2) No. 2 distillate oil or natural gas fired intank heaters, each rated at 0.28 and 1.33 MMBtu/hr, respectively. Other insignificant combustion units include one (1) No. 2 distillate oil fired space heater rated at 0.35 MMBtu/hr and one (1) propane fired hand torch rated at 0.50 MMBtu/hr.

The following calculations determine the amount of emissions created by natural gas combustion, based on 8,760 hours of operation and US EPA's AP-42, 5th Edition, Section 1.4 - Natural Gas Combustion, Tables 1.4-1 and 1.4-2.

Criteria Pollutant: 1.61 MMBtu/hr * 8,760 hr/yr * Ef (lb/MMcf) = (ton/yr)
1000 Btu/cf * 2,000 lb/ton

P M:	1.9	lb/MMcf =	**0.01 ton/yr**
P M-10:	7.6	lb/MMcf =	**0.05 ton/yr**
S O 2:	0.6	lb/MMcf =	**0.00 ton/yr**
N O x:	100.0	lb/MMcf =	**0.71 ton/yr**
V O C:	5.5	lb/MMcf =	**0.04 ton/yr**
C O:	84.0	lb/MMcf =	**0.59 ton/yr**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil
@ 0.50 % sulfur, based on 8,760 hours of use and US EPA's AP-42,
5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-3, and 1.3-7.

Criteria Pollutant: 1.61 MMBtu/hr * 8,760 hr/yr * Ef (lb/1,000 gal) = (ton/yr)
140,000 Btu/gal * 2,000 lb/ton

P M:	2.0	lb/1000 gal =	**0.10 ton/yr**
P M-10:	1.1	lb/1000 gal =	**0.05 ton/yr**
S O 2:	71.0	lb/1000 gal =	**3.58 ton/yr**
N O x:	20.0	lb/1000 gal =	**1.01 ton/yr**
V O C:	0.34	lb/1000 gal =	**0.02 ton/yr**
C O:	5.0	lb/1000 gal =	**0.25 ton/yr**

The following calculations determine the amount of emissions created by the combustion of #2 distillate fuel oil
@ 0.50 % sulfur, based on 8,760 hours of use and US EPA's AP-42,
5th Edition, Section 1.3 - Fuel Oil Combustion, Tables 1.3-1, 1.3-3, and 1.3-7.

Criteria Pollutant: 0.35 MMBtu/hr * 8,760 hr/yr * Ef (lb/1,000 gal) = (ton/yr)
140,000 Btu/gal * 2,000 lb/ton

P M:	2.0	lb/1000 gal =	**0.02 ton/yr**
P M-10:	1.1	lb/1000 gal =	**0.01 ton/yr**
S O 2:	71.0	lb/1000 gal =	**0.78 ton/yr**
N O x:	20.0	lb/1000 gal =	**0.22 ton/yr**
V O C:	0.34	lb/1000 gal =	**0.00 ton/yr**
C O:	5.0	lb/1000 gal =	**0.05 ton/yr**

The following calculations determine the amount of emissions created by propane combustion,
based on 8,760 hours of operation and US EPA's AP-42, 5th Edition, Section 1.5 - Liquefied Petroleum Gas Combustion, Table 1.5-1.

Criteria Pollutant: 0.5 MMBtu/hr * 8,760 hr/yr * Ef (lb/1000 gal) = (ton/yr)
91.5 MMBtu/1000 gal * 2,000 lb/ton

P M:	0.4	lb/1000 gal =	**0.12 ton/yr**
P M-10:	0.4	lb/1000 gal =	**0.12 ton/yr**
S O 2:	0.0	lb/1000 gal =	**0.00 ton/yr**
N O x:	14.0	lb/1000 gal =	**4.17 ton/yr**
V O C:	0.5	lb/1000 gal =	**0.15 ton/yr**
C O:	1.9	lb/1000 gal =	**0.57 ton/yr**

The maximum potential emissions of the insignificant combustion sources are the following:

Criteria Pollutant:

P M:	**0.24 ton/yr**
P M-10:	**0.19 ton/yr**
S O 2:	**4.35 ton/yr**

N O x:	**5.40**	**ton/yr**
V O C:	**0.19**	**ton/yr**
C O:	**1.21**	**ton/yr**

*** * aggregate drying: batch-mix plant * ***

The following calculations determine the amount of worst case emissions created by aggregate drying before controls, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Tables 11.1-2 and 11.1-9 for a batch mix dryer which has the capability of combusting either fuel oil or natural gas:

Pollutant: Ef lb/ton x 300 ton/hr x 8,760 hr/yr / 2,000 lb/ton

Criteria Pollutant:

P M:	32	lb/ton =	***************	**ton/yr**
P M-10:	4.5	lb/ton =	**5,913.00**	**ton/yr**
VOC:	0.011647	lb/ton =	**15.30**	**ton/yr**

The VOC emission factor for aggregate drying includes H

*** * conveying / handling * ***

The following calculations determine the amount of emissions created by material handling, based on 8.760 hours of use and AP-42, Section 13.2.4, Equation 1. The emission factor for calculating PM emissions is calculated as follows:

PM-10 Emissions:

E = k*(0.0032)*(((U/5)^1.3)/((M/2)^1.4))
= 1.12E-03 lb PM-10/ton
2.37E-03 lb PM/ton
where k = 0.35 (particle size multiplier for <10um)
0.74 (particle size multiplier for <30um)
U = 12 mph mean wind speed
M = 4.5 material moisture content (%)

300 ton/hr * 8,760 hrs/yr * Ef (lb/ton of material) = (ton/yr)
2,000 lb/ton

Total PM 1(	**1.48**	**tons/yr**
Total PM E	**3.12**	**tons/yr**

*** * unpaved roads * ***

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 13.2.2.2.

I. Front End Loader - Sand and Aggregates

42.5 trip/hr x
0.0481 mile/trip x
2 (round trip) x
8760 hr/yr = 35815.26 miles per year

Ef = k*[(s/12)^0.8]*[(W/3)^b]/[(M/0.2)^c]*[(365-p)/365]*(S/15)
= 1.28 lb PM-10/mile
= 6.08 lb PM/mile

where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads
b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W = 25 tons average vehicle weight
M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10: 1.28 lb/mi x 35815.26 mi/yr = **22.90 tons/yr**
2000 lb/ton

PM: 6.08 lb/mi x 35815.26 mi/yr = **108.87 tons/yr**
2000 lb/ton

II. Front End Loader - Processed RAP

7.5 trip/hr x
0.0665 mile/trip x
2 (round trip) x
8760 hr/yr = 8738.1 miles per year

Ef = k*[(s/12)^0.8]*[(W/3)^b]/[(M/0.2)^c]*[(365-p)/365]*(S/15)
= 1.28 lb PM-10/mile
= 6.08 lb PM/mile
where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads
b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W = 25 tons average vehicle weight
M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10: 1.28 lb/mi x 8738.1 mi/yr = **5.59 tons/yr**
2000 lb/ton

PM: 6.08 lb/mi x 8738.1 mi/yr = **26.56 tons/yr**
2000 lb/ton

III. Triaxle Dump Truck - Stone

7.6 trip/hr x
0.0947 mile/trip x
2 (round trip) x
8760 hr/yr = 12609.494 miles per year

Ef = k*[(s/12)^0.8]*[(W/3)^b]/[(M/0.2)^c]*[(365-p)/365]*(S/15)
= 1.24 lb PM-10/mile
= 5.83 lb PM/mile
where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads
b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W = 23 tons average vehicle weight
M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10: 1.24 lb/mi x 12609.49 mi/yr = **7.80 tons/yr**
2000 lb/ton

PM: 5.83 lb/mi x 12609.49 mi/yr = **36.77 tons/yr**
2000 lb/ton

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*** * unpaved roads * ***

IV. Semi Dump Truck
4.558 trip/hr x
0.0905 mile/trip x
2 (round trip) x
8760 hr/yr = 7226.9825 miles per year

Ef = k*[(s/12)^0.8]*[(W/3)^b]/[(M/0.2)^c]*[(365-p)/365]*(S/15)
= 1.28 lb PM-10/mile
= 6.12 lb PM/mile
where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads
b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W = 25 tons average vehicle weight
M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10: 1.28 lb/mi x 7226.982 mi/yr = **4.64 tons/yr**
2000 lb/ton

PM: 6.12 lb/mi x 7226.982 mi/yr = **22.10 tons/yr**
2000 lb/ton

V. Triaxle Dump Truck - RAP
2.25 trip/hr x
0.176 mile/trip x
2 (round trip) x
8760 hr/yr = 6937.92 miles per year

Ef = k*[(s/12)^0.8]*[(W/3)^b]/[(M/0.2)^c]*[(365-p)/365]*(S/15)
= 1.24 lb PM-10/mile
= 5.83 lb PM/mile
where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads
b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W = 23 tons average vehicle weight
M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10: 1.24 lb/mi x 6937.92 mi/yr = **4.29 tons/yr**
2000 lb/ton

PM: 5.83 lb/mi x 6937.92 mi/yr = **20.23 tons/yr**
2000 lb/ton

VI. Semi Tank Truck - Liquid Asphalt
0.6 trip/hr x
0.0975 mile/trip x
2 (round trip) x

8760 hr/yr = 1024.92 miles per year

Ef = k*[(s/12)^0.8]*[(W/3)^b]/[(M/0.2)^c]*[(365-p)/365]*(S/15)
= 1.33 lb PM-10/mile
= 6.38 lb PM/mile
where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads
b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W = 28 tons average vehicle weight
M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10: 1.33 lb/mi x 1024.92 mi/yr = / 2000 lb/ton = **0.68 tons/yr**

PM: 6.38 lb/mi x 1024.92 mi/yr = / 2000 lb/ton = **3.27 tons/yr**

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*** * unpaved roads * ***

VII. Semi Dump Truck - Fuel
0.0838 trip/hr x
0.0975 mile/trip x
2 (round trip) x
8760 hr/yr = 143.14716 miles per year

Ef = k*[(s/12)^0.8]*[(W/3)^b]/[(M/0.2)^c]*[(365-p)/365]*(S/15)
= 1.33 lb PM-10/mile
= 6.38 lb PM/mile
where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads
b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W = 28 tons average vehicle weight
M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10: 1.33 lb/mi x 143.1472 mi/yr = / 2000 lb/ton = **0.10 tons/yr**

PM: 6.38 lb/mi x 143.1472 mi/yr = / 2000 lb/ton = **0.46 tons/yr**

VIII. Triaxle Dump Trucks - Silo Loadout Mix
15 trip/hr x
0.0985 mile/trip x
2 (round trip) x
8760 hr/yr = 25885.8 miles per year

Ef = k*[(s/12)^0.8]*[(W/3)^b]/[(M/0.2)^c]*[(365-p)/365]*(S/15)
= 1.24 lb PM-10/mile
= 5.83 lb PM/mile
where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads

b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W = 23 tons average vehicle weight
M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10: 1.24 lb/mi x 25885.8 mi/yr = **16.01 tons/yr**
2000 lb/ton

PM: 5.83 lb/mi x 25885.8 mi/yr = **75.48 tons/yr**
2000 lb/ton

IX. Triaxle Dump Trucks - Plant Loadout Mix

15 trip/hr x
0.123 mile/trip x
2 (round trip) x
8760 hr/yr = 32324.4 miles per year

Ef = k*[(s/12)^0.8]*[(W/3)^b]/[(M/0.2)^c]*[(365-p)/365]*(S/15)
= 1.24 lb PM-10/mile
= 5.83 lb PM/mile
where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s = 4.8 mean % silt content of unpaved roads
b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W = 23 tons average vehicle weight
M = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)
S = 10.0 mph speed limit
p = 125.0 number of days with at least 0.01 in. of precipitation per year

PM-10: 1.24 lb/mi x 32324.4 mi/yr = **19.99 tons/yr**
2000 lb/ton

PM: 5.83 lb/mi x 32324.4 mi/yr = **94.25 tons/yr**
2000 lb/ton

Note: Roadway emissions from Silo Loadout and Plant Loadout are mutually exclusive.

Total PM E 312.51 tons/yr

Total PM-1 65.98 tons/yr

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*** * storage * ***

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

Material	Silt Content (wt %)	Pile Size (acres)	Storage Capac (tons)	PM Emissions tons/yr	PM-10 Emisions tons/yr
Sand	1.2	0.450	11,700	0.11	0.04
Stone	1.1	1.330	34,800	0.31	0.11
Slag	0.9	0.180	4,800	0.03	0.01
RAP	0.2	0.470	12,200	0.02	0.01
Total				**0.48**	**0.17**

Sample Calculation:

Ef = 1.7*(s/1.5)*(365-p)/235*(f/15)
= 1.39 lb/acre/day
where s = 1.2 % silt
p = 125 days of rain greater than or equal to 0.01 inches
f = 15 % of wind greater than or equal to 12 mph

Ep (storage) = Ef * sc * (20 cuft/ton) * (365 day/yr) / (2,000 lb/ton)*(43,560 sqft/acre)*(12 ft)
where sc = 11,700 tons storage capacity

PM = 0.11 tons/yr P M-10: 35% of PM = 0.04 tons/yr

*** *cold mix VOC storage emissions * ***

The following calculations determine the amount of VOC emissions created by the application of cutback asphalt with a typical value of 35% by volume of diluent, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Se

VOC Emission Factor = 1.7% weight percent flash-off of cold mix
Potential Throughput (tons/y ********** tons/yr stockpile mix

Potential VOC Emissions (tons/yr) = Potential Throughput (tons/yr) * wt percent flash-off
Potential VOC Emissions = 44,150.40 tons/yr

* Weight percent flash-off is based on a 7.0 percent by weight of cutback asphalt, containing 35% by volume of diluent of which 95% volatilizes, in stockpile mix and 24% by weight of cutback asphalt evaporated (from Table 4.5-1).

*** * summary of source emissions before controls * ***

Criteria Pollutants:

P M:	**42,518.88**	**ton/yr**	
P M-10:	**6,103.92**	**ton/yr**	
S O 2:	**269.82**	**ton/yr**	
N O x:	**54.02**	**ton/yr**	
V O C:	**44,168.31**	**ton/yr**	(VOCs include HAPs from aggregate drying operation)
C O:	**29.81**	**ton/yr**	

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*** * source emissions after controls * ***

In order to qualify for the FESOP program, this facility must limit PM-10, SO2, and VOC emissions to 99.0 tons per year. Consequently, SO2 emissions from the aggregate dryer must be limited to 89.95 tons per year (99.0 ton/yr - 9.05 ton/yr from the other combustion sources).

* Emissions of PM and PM-10 from aggregate drying operations are contr 99.970 % control efficiency.
Control efficiency represents the combined overall control efficiency of the cyclone and baghouse.

The following calculations determine the amount of emissions created by natural gas combustion based on a ********** cf

Natural Gas 662.256 MMcf/yr * Ef (lb/MMcf) = (ton/yr)
2,000 lb/ton

P M:	1.9	lb/MMcf =	**1.89E-04**	**ton/yr ***
P M-10:	7.6	lb/MMcf =	**7.55E-04**	**ton/yr ***
S O 2:	0.6	lb/MMcf =	**0.20**	**ton/yr**
N O x:	100.0	lb/MMcf =	**33.11**	**ton/yr**
V O C:	5.5	lb/MMcf =	**1.82**	**ton/yr**
C O:	84.0	lb/MMcf =	**27.81**	**ton/yr**

The follow 0.50 % sulfur

based on 2,533,803 gal/yr:

No. 2 Distil ********** gal/yr * Ef (lb/1,000 gal) = (ton/yr)
2,000 lb/ton

P M:	2.0	lb/1000 gal =	**7.60E-04**	**ton/yr ***
P M-10:	1.1	lb/1000 gal =	**4.10E-04**	**ton/yr ***
S O 2:	71.0	lb/1000 gal =	**89.95**	**ton/yr**
N O x:	20.0	lb/1000 gal =	**25.34**	**ton/yr**
V O C:	0.20	lb/1000 gal =	**0.25**	**ton/yr**
C O:	5.0	lb/1000 gal =	**6.33**	**ton/yr**

The follow 0.75 % sulfur

based on 1,631,746 gal/yr:

Waste Oi 1,631,746 gal/yr * Ef (lb/1000 gal) = (ton/yr)
2000 lb/ton

P M:	65.3	lb/1000 gal =	**0.02**	**ton/yr ***
P M-10:	52.0	lb/1000 gal =	**0.01**	**ton/yr ***
S O 2:	110.3	lb/1000 gal =	**89.95**	**ton/yr**
N O x:	19.0	lb/1000 gal =	**15.50**	**ton/yr**
V O C:	1.0	lb/1000 gal =	**0.82**	**ton/yr**
C O:	5.0	lb/1000 gal =	**4.08**	**ton/yr**

Criteria Pollutant:			**Worst Case Fuel**
P M:	**0.02**	**ton/yr ***	Waste Oil
P M-10:	**0.01**	**ton/yr ***	Waste Oil
S O 2:	**89.95**	**ton/yr**	Distillate/Waste Oil
N O x:	**33.11**	**ton/yr**	Natural Gas
V O C:	**1.82**	**ton/yr**	Natural Gas
C O:	**27.81**	**ton/yr**	Natural Gas

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Primary Fuel Usage Limitations

Fuel Oil: waste oil

89.95 tons SO2/year limited * 4730.40 Kgals = 1631.75 Kgals
260.7633 tons SO2/year potential year potential year limited

Secondary Fuel Usage Limitations

Fuel Oil: #2 distillate fuel oil

89.95 tons SO2/year limited * 4730.40 Kgals = 2533.80 Kgals
167.93 tons SO2/year potential year potential year limited

Primary fuel equivalence limit for natural gas based on SO2 emissions from waste oil

0.20 n.g. potential emissions (ton/yr) / 260.76 W.O. potential emissions (ton/yr)
662.26 n.g. potential usage (MMCF/yr) 4730.4 W.O. potential usage (kgal/yr)

= 0.0054 Kgal W.O. burned
MMCF n.g. burned

Primary fuel equivalence limit for #2 distillate fuel oil based on SO2 emissions from waste oil

167.93 #2 F.O. potential emissions (ton/yr) / 260.76 W.O. potential emissions (ton/yr)
4730.40 #2 F.O. potential usage (kgal/yr) 4730.4 W.O. potential usage (kgal/yr)

= 0.6440 Kgal W.O. burned / Kgal #2 F.O. burned

*** * source emissions after controls * ***

	misc. combustion:		nonfugitive		
P M:	0.37	ton/yr x	100.00%	emitted after controls =	**0.37 ton/yr**
P M-10:	0.26	ton/yr x	100.00%	emitted after controls =	**0.26 ton/yr**
	aggregate drying:		nonfugitive		
P M:	42,048.00	ton/yr x	0.01%	emitted after controls =	**6.31 ton/yr**
P M-10:	5,913.00	ton/yr x	0.01%	emitted after controls =	**0.89 ton/yr**
VOC:	15.30	ton/yr x	100.00%	emitted after controls =	**7.65 ton/yr**
	conveying/handling:		fugitive		
P M:	3.12	ton/yr x	25%	emitted after controls =	**0.78 ton/yr**
P M-10:	1.48	ton/yr x	50%	emitted after controls =	**0.74 ton/yr**
	unpaved roads:		fugitive		
P M:	312.51	ton/yr x	25%	emitted after controls =	**78.13 ton/yr**
P M-10:	65.98	ton/yr x	50%	emitted after controls =	**32.99 ton/yr**
	storage piles:		fugitive		
P M:	0.48	ton/yr x	50%	emitted after controls =	**0.24 ton/yr**
P M-10:	0.17	ton/yr x	100%	emitted after controls =	**0.17 ton/yr**
	cold mix VOC storage:		fugitive		
VOC:	44,150.40	ton/yr	93.98	Limited Diluent Throughput (tons/	**89.28 ton/yr**

Note: To insure that PM emissions do not exceed 250 tons per year, the asphalt mix produced by the plant will be limited to 1,314,000 tons per year (50% of max.), therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

*** * summary of source emissions after controls * ***

Criteria Pollutant:	**Non-Fugitive**	**Fugitive**	**Total**
PM:	**6.70 ton/yr**	**79.15 ton/yr**	**85.84 ton/yr**
PM-10:	**1.16 ton/yr**	**33.90 ton/yr**	**35.05 ton/yr**
S O 2:	**99.00 ton/yr**	**0.00 ton/yr**	**99.00 ton/yr**
N O x:	**39.83 ton/yr**	**0.00 ton/yr**	**39.83 ton/yr**
V O C:	**9.72 ton/yr**	**89.28 ton/yr**	**99.00 ton/yr**
C O:	**29.81 ton/yr**	**0.00 ton/yr**	**29.81 ton/yr**

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Hazardous Air Pollutants (HAPs)

**** aggregate dryer burner****

The following calculations determine the amount of HAP emissions created by the combustion of distillate fuel oil before & after controls 0.50 % sulfur, from the aggregate dryer burner, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.3 - Fuel Oil Combustion, Table 1.3-11.

Hazardous Air Pollutants (H 75.6 MMBtu/hr * 8760 hr/yr / 2,000 lb/ton * Ef (lb/10^12 Btu) = (ton/yr)

			Potential To Emit	Limited Emissions
Arsenic:	4	lb/10^12 Btu =	1.32E-03 ton/yr	1.99E-07 ton/yr

Beryllium:	3	lb/10^12 Btu =	9.93E-04	ton/yr	1.49E-07	ton/yr
Cadmium:	3	lb/10^12 Btu =	9.93E-04	ton/yr	1.49E-07	ton/yr
Chromium:	3	lb/10^12 Btu =	9.93E-04	ton/yr	1.49E-07	ton/yr
Lead:	9	lb/10^12 Btu =	2.98E-03	ton/yr	4.47E-07	ton/yr
Manganese	6	lb/10^12 Btu =	1.99E-03	ton/yr	2.98E-07	ton/yr
Mercury:	3	lb/10^12 Btu =	9.93E-04	ton/yr	1.49E-07	ton/yr
Nickel:	3	lb/10^12 Btu =	9.93E-04	ton/yr	1.49E-07	ton/yr
Selenium:	15	lb/10^12 Btu =	4.97E-03	ton/yr	7.45E-07	ton/yr
		Total HAPs =	1.13E-02	ton/yr	1.69E-06	ton/yr

The following calculations determine the amount of emissions created by waste oil combustion, from asphalt heating. 0.0072 % lead, based on 8,760 hours of use and US EPA's AP-42, 5th Edition, Section 1.11 - Waste Oil Combustion, Tables 1.11-1, 1.11-2, 1.11-3, and 1.11-4.

Hazardous Air Pollutants (H: 75.6 MMBtu/hr * 8760 hr/yr * Ef (lb/1000 gal) = (ton/yr)
140,000 Btu/gal * 2000 lb/ton * 1000 gal/kgal

			Potential To Emit		Limited Emissions	
Lead:	0.396	lb/1000 gal =	0.94	ton/yr	1.40E-04	ton/yr
Arsenic:	0.11	lb/1000 gal =	0.26	ton/yr	3.90E-05	ton/yr
Cadmium:	0.0093	lb/1000 gal =	0.02	ton/yr	3.30E-06	ton/yr
Chromium:	0.02	lb/1000 gal =	0.05	ton/yr	7.10E-06	ton/yr
Cobalt:	0.00021	lb/1000 gal =	0.00	ton/yr	7.45E-08	ton/yr
Manganese	0.068	lb/1000 gal =	0.16	ton/yr	2.41E-05	ton/yr
Nickel:	0.011	lb/1000 gal =	0.03	ton/yr	3.90E-06	ton/yr
		Total HAPs =	1.45	ton/yr	2.18E-04	ton/yr

*** * aggregate drying: drum-mix plant * ***

The following calculations determine the amount of HAP emissions created by aggregate drying before & after controls, based on 8,760 hours of use and USEPA's AP-42, 5th Edition, Section 11.1 - Hot Mix Asphalt Plants, Table 11.1-9 for a batch mix dryer which can be fired with either fuel oil or natural gas. The HAP emission factors represent the worst case emissions (natural gas combustion).

Pollutant: Ef lb/ton x 300 ton/hr x 8760 hr/yr
2000 lb/ton

Hazardous Air Pollutants (HAPs):			Potential To Emit		Limited Emissions	
Acetaldeh	6.40E-04	lb/ton =	0.84	ton/yr	0.42	ton/yr
Benzene:	3.50E-04	lb/ton =	0.46	ton/yr	0.23	ton/yr
Ethylbenz	3.30E-03	lb/ton =	4.34	ton/yr	2.17	ton/yr
Formaldel	8.60E-04	lb/ton =	1.13	ton/yr	0.57	ton/yr
Quinone:	2.70E-04	lb/ton =	0.35	ton/yr	0.18	ton/yr
Toluene:	1.80E-03	lb/ton =	2.37	ton/yr	1.18	ton/yr
****Total Po**	1.270E-04	lb/ton =	0.17	ton/yr	0.08	ton/yr
Xylene:	4.30E-03	lb/ton =	5.65	ton/yr	2.83	ton/yr
		Total HAPs	15.30	ton/yr	7.65	ton/yr

** total POM includes 2-Methylnapthalene, Acenaphthene, Acenaphthylene, Anthracene, Benzo(a)anthracene, Benzo(b)fluoranthene, E
Fluoranthene, Fluorene, Naphthalene, Phenanthrene, and Pyrene.

Note: Limited HAP emissions include a limit on asphalt mix production of 1,314,000 tons per year.

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*** * summary of source HAP emissions potential to emit * ***

Hazardous Air Pollutants (HAPs):

Acetaldehy	**0.841**	ton/yr
Arsenic:	**0.260**	ton/yr

Benzene:	**0.460**	ton/yr
Beryllium:	**0.001**	ton/yr
Cadmium:	**0.022**	ton/yr
Chromium	**0.047**	ton/yr
Cobalt:	**0.000**	ton/yr
Ethylbenze	**4.336**	ton/yr
Formaldeh	**1.130**	ton/yr
Lead:	**0.937**	ton/yr
Manganes	**0.161**	ton/yr
Mercury:	**0.001**	ton/yr
Nickel:	**0.026**	ton/yr
Quinone:	**0.355**	ton/yr
Selenium:	**0.005**	ton/yr
Toluene:	**2.365**	ton/yr
Total POM	**0.167**	ton/yr
Xylene:	**5.650**	ton/yr
Total:	**16.765**	**ton/yr**

*** * summary of source HAP limited emissions * ***

Hazardous Air Pollutants (HAPs):

Acetaldehy	**0.420**	ton/yr
Arsenic:	**0.000**	ton/yr
Benzene:	**0.230**	ton/yr
Beryllium:	**0.000**	ton/yr
Cadmium:	**0.000**	ton/yr
Chromium	**0.000**	ton/yr
Cobalt:	**0.000**	ton/yr
Ethylbenze	**2.168**	ton/yr
Formaldeh	**0.565**	ton/yr
Lead:	**0.000**	ton/yr
Manganes	**0.000**	ton/yr
Mercury:	**0.000**	ton/yr
Nickel:	**0.000**	ton/yr
Quinone:	**0.177**	ton/yr
Selenium:	**0.000**	ton/yr
Toluene:	**1.183**	ton/yr
Total POM	**0.083**	ton/yr
Xylene:	**2.825**	ton/yr
Total:	**7.652**	**ton/yr**

*** * miscellaneous * ***

326 IAC 7 Compliance Calculations:

The following calculations determine the maximum sulfur content of distillate fuel oil allowable by 326 IAC 7:

0.5	lb/MMBtu	140,000	Btu/gal=	70	lb/1000gal
70	lb/1000gal	142	lb/1000 gal =	0.5	%

Sulfur content must be less than or e 0.5% to comply with 326 IAC 7.

The following calculations determine the maximum sulfur content of waste (residual) oil allowable by 326 IAC 7:

1.6 lb/MMBtu 140,000 Btu/gal= 224 lb/1000gal

224 lb/1000gal 147 lb/1000 gal = 1.5 %

Sulfur content must be less than or e 1.5% to comply with 326 IAC 7.

326 IAC 6-3-2 Compliance Calculations:

The following calculations determine compliance with 326 IAC 6-3-2 for process weight rates in excess of 30 tons per hour:

limit = 55 * (300 ^ 0.11) - 40 = 63.00 lb/hr or
275.95 ton/yr

Since this emission limit exceeds the PSD source definition of 250 tons/yr and the Subpart I allowable emission limit of 59.75 tons per year, compliance with the PM limit pursuant to 40 CFR 60.90, Subpart I will satisfy the requirements of 326 IAC 6-3-2 and will exempt the source from the requirements of 326 IAC 2-2 (PSD).

PM-10 Emission Limit for Aggregate Dryer:

(99.0 tons PM-10/yr - 34.17 tons PM-10/yr from other souces)
= 64.83 tons PM-10/yr = 14.80 lbs/hr

PM-10 emissions from the aggregate dryer are controlled to 0.2 lbs/hr < 14.80 lb (Will comply)

40 CFR Part 60.90, Subpart I (Standards of Performance for Hot Mix Asphalt Plants) Compliance Calculations:

The following calculations determine compliance with the NSPS, which limits stack emissions from asphalt plants to 0.04 gr/dscf:

$$\frac{6.31 \text{ ton/yr} * 2000 \text{ lb/ton} * 7000 \text{ gr/lb}}{525{,}600 \text{ min/yr} * 39{,}790 \text{ dscf/min}} = 0.004 \text{ gr/dscf}$$ (will comply)

Allowable pa 59.75 tons per year. 13.64 lbs/hr

Note:
SCFM = 57,211 acfm * (460 + 68)*(1-0.045) / (460 + 265)
= 39,790 scfm

Assumes exhaust gas temperature of 265F, exhaust gas moisture content of 4.5% and exhaust gas flow of 57,211 acfm.